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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

IN RE SUBPOENA OF  
RICHARD SEDDON.

Case No. 1:22-MC-00008-BLG-SPW-TJC

**PROJECT VERITAS'S MOTION TO  
QUASH SUBPOENA TO PRODUCE  
DOCUMENTS AND INFORMATION**

For the reasons set forth in the accompanying Memorandum in Support, Project Veritas files this Motion to Quash a Subpoena served by the American Federation of Teachers Michigan ("AFT Michigan") under Federal Rule of Civil Procedure 45 to a non-party to a lawsuit pending in the Eastern District of Michigan, *AFT Michigan v. Project Veritas, et al.*, 17-CV-13292 (E.D. Mich.) (the "Subpoena"). The Subpoena seeks privileged and confidential information protected by the First Amendment of the United States Constitution, information that the court hearing the underlying case has already prohibited AFT Michigan from seeking, and information that has already been objected to in the underlying case.

Under Rule 45(d)(3)(a), a motion to quash a non-party subpoena is to be filed with the court where compliance with the subpoena is to take place. That is this Court, in the District of Montana. Project Veritas therefore files the instant miscellaneous action and motion seeking such relief. Under Rule 45, a court *must* quash or modify a subpoena that (1) requires disclosure of privileged or other protected matter, if no exception or waiver applies, or (2) subjects a person to an undue burden. Fed. R. Civ. P. 45(d)(3)(A) (“On timely motion, the court for the district where compliance is required **must** quash or modify a subpoena that . . . requires disclosure of privileged or other protected matter, if no exception or waiver applies . . . .” (emphasis added)).

Because the Subpoena requires disclosure of privileged or other protected matter, subjects parties and non-parties alike to undue burdens, and seeks information in violation of current court orders and stipulated orders, Project Veritas requests that the Subpoena and/or the document requests served along with it be quashed and that Project Veritas be awarded its attorneys’ fees incurred in filing the instant motion.

Pursuant to L.R. 7.1(c)(1), counsel for Project Veritas contacted counsel for AFT Michigan—the party who issued, signed, and served the Subpoena in question—regarding this Motion. AFT Michigan opposes the motion. Project Veritas relies further on the accompanying Memorandum in Support.

Dated this 9th day of June, 2022.

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By /s/ Brad J. Brown  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 9th day of June, 2022, a true and correct copy of the foregoing document was mailed, postage prepaid, and by electronic mail to the following:

☒ U.S. Mail  
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